

1 Chaim Z. Appel, Esq. (*Admitted pro hac vice*)  
2 New York State Bar No. 4849444

2 APPEL LAW FIRM PLLC  
4533-16 Avenue

3 Brooklyn, New York 11204  
Telephone: (212) 252-2045

4 Facsimile: (718) 972-3371  
*cappel@CustomsAndLaw.com*

5

6 John K. Gallagher, Esq.  
7 Nevada State Bar No. 956  
GUILD, GALLAGHER & FULLER, LTD.

7 100 West Liberty Street, Suite 800  
Reno, Nevada 89501

8 Telephone: (775) 786-2366  
Facsimile: (775) 322-9105

9 *jgallagher@ggfltd.com*

10 *Attorneys for Plaintiffs*

11 UNITED STATES DISTRICT COURT

12 DISTRICT OF NEVADA

13 JOSEPH WEINFELD, LIANA KNIJNKOVA, )  
14 ISAAC WEISS, ROBERT FRANK, )  
15 YEHUDAH NUSSBAUM, MOSES )  
STEINMETZ, ALBERT ISAAC, JOSEF )  
16 KOHN, MICHAEL FRIEDMAN and )  
CONGREGATION BETH JOSEPH, )  
17 Derivatively on behalf of PRECIOUS )  
MINERALS MINING AND REFINING )  
CORP., )

18 Plaintiffs, )

19 v. )

20 BILL L. MINOR, JOHN H. REYNOLDS, and )  
WALTER A. MARTING, JR., )

21 Defendants, )

22 and )

23 PRECIOUS MINERALS MINING AND )  
REFINING CORP., a Nevada corporation, )

24 Nominal Defendant. )

25 Case No. 3:14-cv-00513-RCJ-WGC

26 STIPULATION AND ORDER TO  
EXTEND PLAINTIFFS' TIME TO FILE  
AN OPPOSITION TO DEFENDANTS'  
MOTION FOR FEES AND COSTS

27 (Second Request)

28 Plaintiffs JOSEPH WEINFELD, LIANA KNIJNKOVA, ISAAC WEISS, ROBERT  
FRANK, YEHUDAH NUSSBAUM, MOSES STEINMETZ, ALBERT ISAAC, JOSEF KOHN,

1 MICHAEL FRIEDMAN and CONGREGATION BETH JOSEPH, derivatively on behalf of  
2 PRECIOUS MINERALS MINING AND REFINING CORP. (hereinafter "Plaintiffs"), and  
3 Defendants BILL L. MINOR, JOHN H. REYNOLDS, and WALTER A. MARTING, JR.  
4 (hereinafter "Defendants"), pursuant to LR IA 6-1, LR IA 6-2 and LR II 7-1, hereby stipulate and  
5 agree as follows:

6 **WHEREAS**, on March 27, 2018, this Court entered its Order and Judgment in this case for  
7 Defendants, [ECF No. 157-8], on April 10, 2018, Defendants filed Defendants' Motion for  
8 Attorneys' Fees and Costs (hereinafter "Motion"), [ECF No. 160], and on April 24, 2018, the  
9 Court entered a Stipulation and Order to Extend Plaintiffs' Time to File an Opposition to  
10 Defendants' Motion for Fees and Costs in this matter extending the deadline for Plaintiffs to file  
11 an opposition to the Motion to the current deadline of Tuesday, May 22, 2018;

12 Given that Defendants' Motion is directed at each of the remaining eight (8) individual  
13 Plaintiffs, with whom their counsel required time to meet individually to review and respond to  
14 Defendants' Motion, and that Plaintiffs' counsel had a religious obligation that prevented him  
15 from working on this matter from Friday evening, May 18, 2018, until Monday evening, May 21,  
16 2018;

17 This is the second stipulation for extension of time to file an opposition to a motion;

18 This stipulation is made by the parties in good faith and not for any improper purpose;

19 // / / /

20 // / / /

21 // / / /

22 // / / /

23 // / / /

24 // / / /

25 // / / /

26 // / / /

27 // / / /

28 // / / /

1       **NOW, THEREFORE**, and good cause appearing, it is hereby stipulated and agreed as  
2 follows:

3       1. The current deadline to oppose Defendants' Motion shall be extended for a period  
4 of one (1) week, such that the deadline for Plaintiffs to file their opposition to Defendants' Motion  
5 shall be extended to expire on Tuesday, May 29, 2018.

6       DATED the 22nd day of May, 2018.

7       LAW OFFICES OF MICHAEL J.                   APPEL LAW FIRM PLLC  
8       MORRISON

9       By:    */s/ Michael J. Morrison*                   By:    */s/ Chaim Z. Appel*  
10       Michael J. Morrison, Esq.                   Chaim Z. Appel, Esq. (*pro hac vice*)  
11       Nevada State Bar No. 1665                   4533-16 Avenue  
12       1495 Ridgeview Drive, Suite 220           Brooklyn, New York 11204  
13       Reno, NV 89519                               (212) 252-2045 (phone)  
14       Tel. (775) 827-6300                           (718) 872-3371 (fax)  
15       *venturelawusa@gmail.com*

16       *Counsel for Defendants*

17       */s/ Chaim Z. Appel*                           */s/ Michael J. Morrison*  
18       Chaim Z. Appel, Esq. (*pro hac vice*)           Michael J. Morrison, Esq.  
19       4533-16 Avenue                               Nevada State Bar No. 1665  
20       Brooklyn, New York 11204                   1495 Ridgeview Drive, Suite 220  
21       (212) 252-2045 (phone)                       Reno, NV 89519  
22       (718) 872-3371 (fax)                           Tel. (775) 827-6300  
23       *cappel@customsandlaw.com*                   *venturelawusa@gmail.com*

24       *Counsel for Plaintiffs*

25       IT IS SO ORDERED:

26         
27       \_\_\_\_\_  
28       UNITED STATES MAGISTRATE JUDGE  
29       \_\_\_\_\_  
30       DATED: May 24, 2018

31

32

33

34

35

36

37

38

39

40

41

42

43

44

45

46

47

48

49

50

51

52

53

54

55

56

57

58

59

60

61

62

63

64

65

66

67

68

69

70

71

72

73

74

75

76

77

78

79

80

81

82

83

84

85

86

87

88

89

90

91

92

93

94

95

96

97

98

99

100

101

102

103

104

105

106

107

108

109

110

111

112

113

114

115

116

117

118

119

120

121

122

123

124

125

126

127

128

129

130

131

132

133

134

135

136

137

138

139

140

141

142

143

144

145

146

147

148

149

150

151

152

153

154

155

156

157

158

159

160

161

162

163

164

165

166

167

168

169

170

171

172

173

174

175

176

177

178

179

180

181

182

183

184

185

186

187

188

189

190

191

192

193

194

195

196

197

198

199

200

201

202

203

204

205

206

207

208

209

210

211

212

213

214

215

216

217

218

219

220

221

222

223

224

225

226

227

228

229

230

231

232

233

234

235

236

237

238

239

240

241

242

243

244

245

246

247

248

249

250

251

252

253

254

255

256

257

258

259

260

261

262

263

264

265

266

267

268

269

270

271

272

273

274

275

276

277

278

279

280

281

282

283

284

285

286

287

288

289

290

291

292

293

294

295

296

297

298

299

300

301